

Annual Customer Proprietary Network Information Certification
Pursuant to 47 CFR § 64.2009(e)
February 2013

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012.

Name of Company: Intrado Communications Inc.

Form 499 Filer ID: 821302

Name of Signatory: Craig W. Donaldson

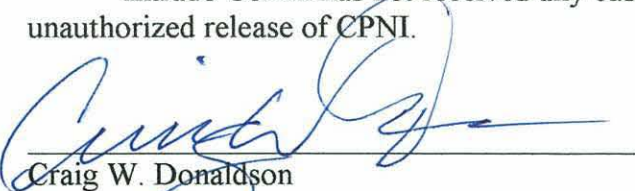
Title of Signatory: Vice President Government and Regulatory Affairs

I, Craig W. Donaldson, certify that I am an officer of Intrado Communications Inc. ("Intrado Comm"), and acting as an agent of Intrado Comm, that I have personal knowledge that Intrado Comm has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Intrado Comm's procedures ensure the company is in compliance with the requirements set forth in sections § 64.2001 *et seq* of the Commission's rules.

Intrado Comm has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. Intrado Comm has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI.

Intrado Comm has not received any customer complaints in 2012 concerning the unauthorized release of CPNI.



Craig W. Donaldson
VP, Regulatory and Government Affairs
Intrado Communications Inc.

Date: Feb. 18, 2013

Customer Proprietary Network Information Certification Attachment A

Intrado Communications Inc. ("Intrado Comm") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the FCC's rules. This attachment summarizes those practices and procedures.

Safeguarding against pretexting

- Intrado Comm takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Intrado Comm is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- Intrado Comm trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out Intrado Comm's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, (d) obtain customers' informed consent as required with respect to its use for marketing purposes, and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI, and the use of CPNI for marketing campaigns.
- Intrado Comm employees are required to review Intrado Comm's CPNI practices and procedures.
- Intrado Comm has a disciplinary process in place for violation of the Intrado Comm's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

Intrado Comm's use of CPNI

- Intrado Comm may use CPNI for the following purposes:
 - To initiate, render, maintain, repair, bill and collect for services;
 - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
- Intrado Comm does not disclose or permit access to CPNI to track customers that call competing service providers.

- Intrado Comm discloses and permits access to CPNI where required by law (*e.g.*, under a lawfully issued subpoena).

Customer approval and informed consent

- In the event that Intrado Comm utilizes CPNI for marketing purposes, it will first implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system will also allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
- Intrado Comm will provide individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI. The content of Intrado Comm's CPNI notices will comply with FCC rule 64.2008(c).

Opt-in

- Intrado Comm does not share, disclose, or otherwise provide CPNI to third parties for marketing purposes.

Additional safeguards

- Intrado Comm will maintain for at least one year records of all marketing campaigns that use its customers' CPNI, including a description of each campaign and the CPNI used, the products offered as part of the campaign, and, if applicable, instances where CPNI was disclosed to third parties or where third parties were allowed access to CPNI. Such campaigns are subject to a supervisory approval and compliance review process, the records of which also are maintained for a minimum of one year.
- Intrado Comm has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- Online access to CPNI is not available to Intrado Comm's business customers.
- Intrado Comm may negotiate alternative authentication procedures for services that Intrado Comm provides to business customers that have both a dedicated account representative and a contract that specifically addresses Intrado Comm's protection of CPNI.
- In the event of a breach of CPNI, as defined in 47 C.F.R. § 64.2011(e), Intrado Comm will notify the United States Secret Service and the Federal Bureau of Investigation, via the FCC's central reporting facility at www.fcc.gov/eb/cpni, as soon as practicable and no later than seven (7) business days from discovering the

breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs Intrado Comm to delay notification, or Intrado Comm and the investigatory party agree to an earlier notification. Intrado Comm will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers for a minimum of two years.

- In the event that Intrado Comm discloses to or provides independent contractors or joint venture partners with access to CPNI, it does so pursuant to confidentiality agreements that (a) require the independent contractor/joint venture partner to use CPNI only for the purpose it has been provided, (b) prohibit independent contractor/joint venture partners disclosure of such CPNI except under force of law, and (c) require the independent contractor/joint venture partner to have appropriate protections in place to ensure the ongoing confidentiality of the CPNI.